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August 3, 2005

Ms. Bethaney Healy
Courtroom Clerk
United States District Court
Federal Building and Courthouse
1550 Main Street
Springfield, MA 01103

VIA FACSIMILE ONLY
785-0204

Re: *United States of America v. Julio Marin*
United States District Court Criminal Action No. 05-30039-MAP

Dear Ms. Healy:

This letter concerns the upcoming status conference before Magistrate Judge Neiman on Thursday, August 4th. Yesterday I received a draft Joint Trial Memo from AUSA Todd Newhouse. This is to inform the court that I do not join in that memo.

Automatic discovery in this case consists mostly of video and audio tape recordings which were first made available to me on Friday of last week, and I have only now received them. It was my understanding with Mr. Newhouse that he would agree to continue time schedules to allow me to make discovery requests and file discovery motions, if necessary, after an opportunity to review these video and/or audio recordings.

Accordingly, I will be asking the court for a one month extension and setting of a new status conference at that time. It is understood that Mr. Marin will waive the speedy trial period for that month should the court grant that time.

Thank you.

Very truly yours,

Myles D. Jacobson

Dictated by not read

Myles D. Jacobson

MDJ/taf

cc: AUSA Todd E. Newhouse, via facsimile